North Coast Timber Supply Area
Timber Supply Review

Summary of Public Input

BC Ministry of Forests
North Coast Forest District
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This is a summary of the public input received on the Timber Supply Review in the North Coast Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

104-01790/

Background

As part of the review of timber supply in the North Coast Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the North Coast TSA *Data Package* and *Information Report* in February 1998. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the North Coast TSA. A 30-day review period, ending March 16, 1998, was provided for the public to comment on these documents.

On November 24, 1999, the British Columbia Forest Service released the 1999 North Coast Timber Supply Area Analysis Report and Public Discussion Paper. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 60-day review period that ended January 28, 2000.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut (AAC) for the North Coast TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the Freedom of Information and Protection of Privacy Act) can be reviewed at the North Coast Forest District office.

Public Review Process and Response

North Coast Forest District staff actively solicited public input on the Timber Supply Review in the North Coast TSA through the following actions:

- the Information Report, Public Discussion Paper and Analysis Report were mailed to First Nations, licensees, forest workers, the Chamber of Commerce, environmental groups and local government in the North Coast TSA with a cover letter indicating that district staff were available to meet to discuss questions or concerns.
- the Data Package and Analysis Report were available at the forest district office in Prince Rupert and the regional office in Smithers.
- First Nations in the North Coast TSA were contacted by phone to offer meetings, as was the mayor of Prince Rupert.
- meetings regarding both the *Data Package* and *Analysis Report* were held with representatives from First Nations, the MLA, the forest industry and other interest groups.
- local media were provided with news releases. An article was published March 1, 1998, in the *Prince Rupert This Week*.

As Table 1 shows, about 12 individuals attended information sessions or meetings. The North Coast Forest District also received five written submissions on the *Data Package* and eight submissions on the *Analysis Report* (see Appendix 1).

Activity (# of participants)	Date
Elected officials	
MLA (1)	Feb. 12/98 & Nov. 23/99
Interest groups	
Prince Rupert Environmental Society (1)	Feb. 28/98
First Nations	
Lax Kw'alaams Consultation Process Mtg. (8)	March 18/98 Jan. 18 & Feb. 11, 2000
Nisga'a Nation (1)	
General Public	
One individual	Dec. 13/99

Table 1: Participation in public information activities

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the North Coast Timber Supply Area is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report (and Public Discussion Paper)
- Other comments

Data Package

Operable Land Base

Interfor requests that its operability updates, based on recently awarded chart areas, be included in this timber supply review as reflecting current practice. The company says its plans include a high number of height class 3 and lower cedar stands as operable. While agreeing that height class 2 stands or less are currently inoperable, the company recommends that if the inclusion of class 3 stands is problematic, a partition should be established as a performance-oriented area, as in the Mid Coast TSA.

The Prince Rupert Environmental Society questions the use of 620 m^3/ha as the average cut in this TSA and says surveying licensees to achieve this figure is a flawed methodology. The society questions whether that figure includes low productivity sites which make up 68 per cent of the area, since harvesting has been concentrated in good and medium sites. The society also says more justification is needed for the use of a logging cost of \$100/m^3 in defining economic operability.

Land Base Reductions

Interfor says the 100 per cent reduction from the land base of areas categorized as Es1 (high soil sensitivity) should be reviewed. The company says the expansion of heli-logging supports this request, pointing to the reduced risk from road-building and the increase in areas available for heli-logging if they weren't withdrawn as Es1.

Interfor also questions the land base reduction of 25 per cent in Ew1 areas (high wildlife sensitivity) to account for goat habitat at mid-elevations. The company says in the last Timber Supply Review, only 5.9 per cent of the land base was available for harvesting, leaving considerable area for wildlife.

Interfor's submission also addresses the withdrawal of land from the harvesting land base to account for roads, trails and landings. The company says the proposed netdown of 8.4 per cent is excessive and should be four per cent, citing research that shows productivity loss is on average one-half of site degradation, due to canopy closure over the roads. Interfor also points to other coastal areas where road netdowns range from four to seven per cent.

Expected Rate of Growth and Productivity

Interfor expresses the opinion that the results of the Old Growth Site Index project should be used in the base case, noting the chief forester's statement in a Vancouver Sun article (March 25, 1999) that this information will begin to be incorporated into the current Timber Supply Review.

Interfor also says analysis units must be further divided to more accurately capture the growth rates of different species groupings. For example, cedar should be split by good, medium and poor sites.

Minimum Harvestable Age

Interfor recommends that a sensitivity analysis be done around the minimum average stand diameter (greater than 30 cm) required to achieve harvesting eligibility.

Regeneration Practices

An individual submission says a more concerted focus on reforestation is needed, noting that areas left to naturally regenerate often do not do so quickly enough to prevent soil erosion. This submission says the very high rainfall in this area means a different approach to reforestation is needed, compared to other areas of B.C.

Interfor notes they will review their records to assess the historic split between planting and natural regeneration.

Visual Quality

The Prince Rupert Environmental Society says it is pointless to sacrifice tourism potential to short-term clearcuts. The society says more information and more community input is needed to determine visual quality objectives.

Interfor says they will review the current landscape inventory to assess the overall impacts on timber supply. The company asks how the North Coast District is achieving the visual quality buyback directed by the chief forester.

Fish and Wildlife

The Prince Rupert Environmental Society notes that no provision is made for the protection of endangered species or communities, such as three red-listed community types that are Sitka spruce associations. The society is also concerned that North Coast streams are not being protected, especially the headwaters that are so important for coho salmon.

Riparian Areas

Noting the high rainfall in this area, an individual submission says the areas left unlogged in riparian reserve zones do not seem large enough to prevent erosion and flooding of rivers and streams, and damage to fish habitat and recreational uses.

Interfor recommends a review of localized conditions in the North Coast TSA to validate coastal averages for riparian zones, and states their willingness to contribute to such a study.

Socio-Economic Factors

An individual submission says 1991 census data may not accurately reflect the recent, rapid growth of tourism in this area and the associated growth in tourism-related employment.

Timber Supply Area Analysis Report

Existing Volume Estimates

The Hartley Bay Band Council expresses surprise that a more thorough analysis of estimates of existing stand volumes hasn't been done, considering the sensitivity of harvest levels to this factor. The Council recommends the use of statistical power analysis to assess the results of the inventory audit and perhaps yield more definitive results than those achieved by the standard analysis methodology.

Size of the Land Base

The Hartley Bay Band Council question whether the size of the timber harvesting land base accurately reflects operational planning realities. The Council points to licensee requests for volumes that greatly exceed current allocations, apparently due to uncertainties in the market but also in the impact that site assessments and operational planning procedures will have on the availability, size and configuration of approved cutblocks. The Council says, if this is true, it should be accounted for in the analysis by reviewing recent operations to assess land base withdrawals for terrain and gully instability, wildlife tree reserves, riparian areas and archeological site preservation.

Operable Land Base

An individual submission questions the use of a logging cost of $\$100/m^3$ as the cut-off for economic operability. While that figure was acceptable in 1994, the individual says it is questionable in 1999 given that only about two-thirds of the AAC has been logged in each of the past four years. Use of the $100 figure has added about six per cent to the land base, mainly low value forests, according to this submission.

Problem Forest Types

The issue of inclusion of red alder as a commercial species is addressed in a submission from John Kendall Forestry Consulting that was endorsed by eight B.C. wood manufacturing companies. The submission says in the U.S. Pacific Northwest the use of red alder has become a billion dollar a year industry, and it is time to re-evaluate the species' potential in B.C. To accomplish this, the submission recommends that the ministry of forests take steps to determine if a large enough volume of merchantable quality red alder exists and then consider creating an AAC allocation for it.

Expected Rate of Growth and Volume Estimates

A submission from West Fraser Mills says the long-term yield indicated in the timber supply analysis for the North Coast TSA (3.24 m^3/ha/year) is less than half the yield on TFL 41. The submission says the likely underestimation of future stand productivity needs to be highlighted more, because the current estimate is misleading and uncertain.

Environmentally Sensitive Areas

Since slope gradient is only one factor in defining slope stability, and since stability assessments are only required on slopes over 60 per cent, an individual submission is of the opinion that the land base has been overstated by the inclusion of Es1 and Es2 areas (high and moderate soil sensitivity). This individual suggests the North Coast District do a terrain stability study of its working forest as was recently done in the Kalum TSA.

Partition

An individual submission says the data in the *Analysis Report* show that harvesting in poor quality cedar-hemlock stands has been avoided, particularly in the past 22 years. The individual says by area these stands represent about 27 per cent of the working forest and by volume about

20 per cent. A partition of 150 000 m^3 to come from the poor quality and more expensive sites is recommended by this submission.

Socio-Economic Impacts

The Skeena-Queen Charlotte Regional District says it supports practices that maximize long-term sustainable benefits to communities within the North Coast TSA. The regional district supports local hiring practices for logging operations and local processing of wood from the TSA. The regional district says it does not support the continuation of raw log exports out of the TSA.

Other Comments

Many submissions commented on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Planning Processes

The Prince Rupert Environmental Society says an LRMP is needed for the North Coast.

Great Bear Rainforest

Two individual submissions urge protection of this area, due to its importance in Canada and internationally. One individual notes that the sensitive valleys that will be logged are only a small portion of the overall area, but are important for salmon and bear habitat, biodiversity and climate regulation.

Harvest Levels

An individual submission says the AAC should be set at the long-term harvest level immediately, for both economic and environmental reasons. These include the growth of tourism and eco-tourism (that would be harmed by the proposed harvest level); the presence of endangered and threatened species; unresolved First Nations land claims; and the responsibility to protect the habitat of Kermode bears and salmon.

Appendix 1

Submissions received by the North Coast Forest District

Submissions received on the Data Package

Industry

International Forest Products Ltd. (3 submissions)

Interest groups

Prince Rupert Environmental Society

General public

One individual submission

Submissions received on the Timber Supply Analysis Report

First Nations

Hartley Bay Band Council

Local government

Skeena-Queen Charlotte Regional District

Industry

West Fraser Mills

Consultants

John Kendall Forestry Consulting, Irv Penner

General public

Four individual submissions